

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

In Re:

Genevieve M Skaggs

Debtor

Chapter 13

Bankruptcy No. 20-14778-AMC

TRUSTEE'S MOTION TO DISMISS PURSUANT TO 11 U.S.C. SECTION 1307

To the Honorable Judges of the United States Bankruptcy Court for the Eastern District of Pennsylvania:

1. Your Movant is Scott F. Waterman, Esq. the duly qualified and acting Chapter 13 Trustee in the above-captioned case.
2. The within case was commenced by the filing of a Chapter 13 petition on 12/18/2020.
3. This Motion to Dismiss has been filed for the following reason(s):
  - The plan filed by debtor(s) violates 11 U.S.C. Section 1325(a)(4) in that the value, as of the effective date of the plan, of property to be distributed under the plan on account of each allowed unsecured claim is less than the amount that would be paid on such claim if the estate of the debtor(s) were liquidated under Chapter 7 of the Bankruptcy Code.
  - The Plan does not appear to be feasible.

WHEREFORE, Scott F. Waterman, Esq., Standing Chapter 13 Trustee, requests that the Court, after a hearing, enter an Order dismissing this case.

Date: 05/19/2021

Respectfully submitted,

/s/ Polly A. Langdon, Esq.

Polly A. Langdon, Esq.

for

Scott F. Waterman, Esq.

Standing Chapter 13 Trustee

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